



Conestoga Valley

SCHOOL DISTRICT

Edward V. Sherretta, Jr., Director of Technology

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Petition for Waiver of)	
FCC Form 471 Filing Deadline)	
)	
Conestoga Valley School District)	CC Docket No. 02-6
(Conestoga Valley District, BEN 125811))	
)	
Schools and Libraries Universal Service)	
Support Mechanism)	





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Petition for Waiver of
FCC Form 471 Filing Deadline for Funding Year 2019
RE: FCC Form 471 125811

I. INTRODUCTION AND SUMMARY

The Conestoga Valley School District serves kindergarten through Grade 12 children in Lancaster County, Pennsylvania. The district relies heavily on the funding provided by the E-Rate program. The Conestoga Valley School District submitted and certified their Funding Year 2019 FCC Form 471, 191042538, in the "ERC" portal of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") website, on July 11, 2019.

The Director of Technology of the Conestoga Valley School District works E-Rate into his already busy work schedule. The Director of Technology performs the administrative duties associated with E-Rate, along with the many technical and supervisory duties required of him. The Director of Technology occasionally collaborates with the Assistant Business Manager when performing E-Rate duties. The district does not work with an E-Rate consultant, although it may be necessary to do so in the future.



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Unfortunately, the Director of Technology incorrectly assumed that since the contract in question was a multi-year contract, that only one Form 471 needed to be filed for the contract at the start of the contract (instead of the necessary yearly 471 filings). This was different than a "late submission", but was instead a misunderstanding of the E-Rate rules. The Director of Technology did not realize his mistake until he received the July 1, 2019 bill from the Service Provider. At that time, the Director of Technology inquired as to why he was no longer receiving discounted bills. The Service Provider informed him that he needed to request discounted bills each year, and provide the new E-Rate Funding Request Number (FRN). It was only at this time that the Director of Technology realized his mistake in not filing an annual Form 471.

The Director of Technology offers as evidence of his misunderstanding regarding multi-year contracts, the fact that he filed Form 471 for the same funding year for another funding request in a very timely manner on January 26, 2019 (Form 471 191004561).

This clerical error, in not filing the form (where all other program rules were diligently followed), will have a significant adverse financial impact on the school district if this waiver were to not be granted.



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II. Request

The Conestoga Valley School District respectfully petitions the Commission to request a waiver of the Funding Year 2019 FCC Form 471 filing deadline on behalf of the Conestoga Valley School District to allow the Out of Window submission of their E-Rate Funding Year 2019 FCC Form 471 191042538, due to the misunderstanding of the program rules.

Respectfully submitted,

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